

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CELTIC WOMAN LTD.,

Plaintiff,

v.

CELTIC THUNDER, LTD.,  
CELTIC MAN LTD., SHARON  
BROWNE, WLIW LLC,  
ALIGN ENTERTAINMENT GROUP LLC,  
and GUSTAVO SAGASTUME,

Defendants.

Civil Action No. 08-CV-0066

**PLAINTIFF CELTIC WOMAN  
LTD.'S MOTION TO ADMIT  
ERIC D. LEVIN PRO HAC VICE**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Peter A. Herbert, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of the following counsel:

Eric D. Levin  
Hinckley, Allen & Snyder, LLP  
28 State Street  
Boston, MA 02109  
(617) 345-9000  
(617) 345-9020

Eric D. Levin is a member in good standing of the Bar of the States of Massachusetts and Rhode Island. See attached Exhibit A.

There are no pending disciplinary proceedings against Eric. D. Levin in any State or Federal court.

FILED COURT  
U.S. DISTRICT COURT  
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S.D. OF N.Y.

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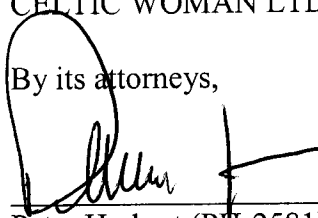
PLEASE TAKE NOTICE that, in accordance with the provisions of Local Civil Rule 6.1(b) of the Southern District of New York, any opposing affidavits and answering memoranda of law shall be served within ten (10) business days after service of the moving papers, and any reply affidavits and memoranda of law shall be served within five (5) business days after service of the answering papers.

Dated: January 22, 2008

Respectfully submitted,

CELTIC WOMAN LTD.

By its attorneys,

A handwritten signature in black ink, appearing to read 'Peter Herbert', is written over a horizontal line.

Peter Herbert (PH-2581)  
Hinckley, Allen & Snyder LLP  
28 State Street  
Boston, MA 02109  
Tel: (617) 345-9000  
Fax: (617) 345-9020

Richard S. Mandel (RM-4884)  
Cowan, Liebowitz & Latman, P.C.  
1133 Avenue of the Americas  
New York, NY 10036  
Tel: (212) 790-9200  
Fax: (212) 575-0671

## COMMONWEALTH OF MASSACHUSETTS

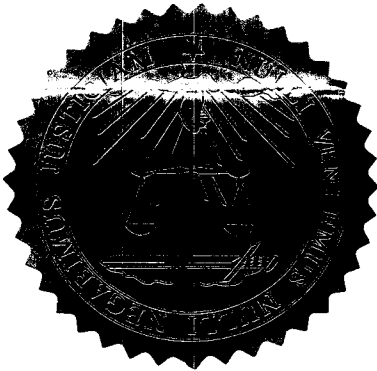
SUFFOLK, SS.

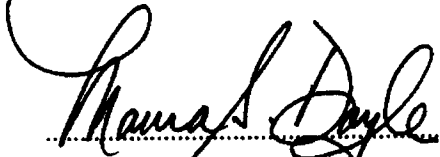
BE IT REMEMBERED, that at the Supreme Judicial Court holden at Boston within and for said County of Suffolk, on the **sixteenth** day of **February** A.D. **1999**, said Court being the highest Court of Record in said Commonwealth:

Eric D. Levin

being found duly qualified in that behalf, and having taken and subscribed the oaths required by law, was admitted to practice as an Attorney, and, by virtue thereof, as a Counsellor at Law, in any of the Courts of the said Commonwealth: that said Attorney is at present a member of the Bar, and is in good standing according to the records of this Court\*.

In testimony whereof, I have hereunto set my hand and affixed the seal of said Court, this **twenty-ninth** day of **January** in the year of our Lord **two thousand and eight**.



  
MAURA S. DOYLE, Clerk

\* Records of private discipline, if any, such as a private reprimand imposed by the Board of Bar Overseers or by any court, are not covered by this certification.

RHODE ISLAND SUPREME COURT

Office of the Clerk

[www.courts.state.ri.us](http://www.courts.state.ri.us)



Licht Judicial Complex  
250 Benefit Street  
Providence, RI 02903  
401-222-3272  
Fax: 401-222-3599

ERIC C. LEVIN  
HINCKLEY ALLEN & SNYDER LLP  
28 STATE STREET  
BOSTON, MA 02109

This certifies that ERIC C. LEVIN of BOSTON, MASSACHUSETTS, is an Attorney and Counselor of the Supreme Court of the State of Rhode Island, and as such was on 28-NOV-2007 admitted to practice in all the Courts of said State, as appears of record in this the office of the clerk of the Supreme Court of said State and is in good standing and qualified to practice in said Courts. The Supreme Court is the highest Court in the State.

Given under my hand and the seal of said Supreme Court  
at Providence, on January 28, 2008.

  
Clerk

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

\_\_\_\_\_  
CELTIC WOMAN LTD.,

Plaintiff,

v.

\_\_\_\_\_  
CELTIC THUNDER, LTD.,  
CELTIC MAN LTD., SHARON  
BROWNE, WLIW LLC,  
ALIGN ENTERTAINMENT GROUP LLC,  
and GUSTAVO SAGASTUME,

Defendants.  
\_\_\_\_\_

Civil Action No. 08-CV-0066

**AFFIDAVIT OF PETER A. HERBERT  
IN SUPPORT OF  
PLAINTIFF CELTIC WOMAN  
LTD.'S MOTION TO ADMIT  
ERIC D. LEVIN PRO HAC VICE**

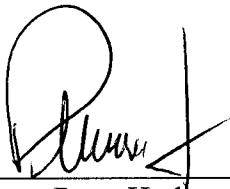
I, Peter A. Herbert, being duly sworn, hereby depose and say as follows:

1. I am a Partner of Hinckley, Allen & Snyder, LLP and am counsel for Plaintiff in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's Motion to admit Eric D. Levin as counsel pro hac vice to represent Plaintiff in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law IN THE State of New York in 1965. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Eric D. Levin since May 2007.
4. Mr. Levin is a Partner at Hinckley, Allen & Snyder, LLP

5. I have found Mr. Levin to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure and the Local Rules of the United States District Court of the Southern District of New York.
6. Accordingly, I am pleased to move the admission of Eric. D. Levin, pro hac vice.
7. I respectfully submit a proposed order granting the admission of Eric D. Levin, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Eric D. Levin, pro hac vice, to represent Plaintiff in the above captioned matter, be granted.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 22, 2008.



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Peter Herbert

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CELTIC WOMAN LTD.,

Plaintiff,

v.

CELTIC THUNDER, LTD.,

CELTIC MAN LTD., SHARON

BROWNE, WLIW LLC,

ALIGN ENTERTAINMENT GROUP LLC,

and GUSTAVO SAGASTUME,

Defendants.

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Civil Action No. 08-CV-0066

**ORDER FOR ADMISSION  
PRO HAC VICE  
ON WRITTEN MOTION**

Upon the motion of Peter A. Herbert, attorney for Celtic Woman, Ltd. and said sponsor attorney's affidavit in support thereof;

IT IS HEREBY ORDERED that

Eric D. Levin  
Hinckley, Allen & Snyder, LLP  
28 State Street  
Boston, MA 02109  
(617) 345-9000  
(617) 345-9020

is admitted to practice pro hac vice as counsel for Celtic Woman, Ltd. in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated:  
New York, New York:

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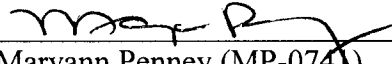
United States District/Magistrate Judge

**CERTIFICATE OF SERVICE**

I, Maryann E. Penney, being a member of the Bar of this Court, certify that on February 4, 2008, I caused a true copy of the foregoing *Plaintiff Celtic Woman LTD. 's Motion to Admit Eric D. Levin Pro Hac Vice* and supporting papers, to be served upon the Defendants WLIW LLC, Gustavo Sagastume, and Sharon Browne by First Class Mail addressed to Defendants' counsel at:

Jeremy Feigelson, Esq.  
Debevoise & Plimpton LLP  
919 Third Avenue  
New York, New York 10022

Dated: New York, New York  
February 4, 2008

  
\_\_\_\_\_  
Maryann Penney (MP-0741)